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Before the  
FEDERAL COMMUNICATIONS COMMISSION

JUN - 2 1993

Washington DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of Replacement of  
Part 90 with Part 88 to Revise the  
Private Land Mobile Radio Services  
and Modify Policies Governing them

PR Docket 92-235

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COMMENTS OF

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Robert Kelty files these Comments in the FCC's Notice of  
Proposed Rulemaking PR Docket No. 92-235.

Summary:

I agree that *Refarming* is timely because substantial  
system migration to 800 MHz with success has made it  
desirable to improve policies and procedures for land  
mobile frequencies below 470 MHz.

But I feel that abandoning highly effective  
narrowband FM technology and all existing systems and  
hardware wholesale in favor of unproven emerging  
technologies would be an economic disaster to licensees.

**Background:**

Robert Kelty and Mobile Radio Resources provide a FCC database and licensing service for Public Safety, Industrial, and Land Transportation clients who need to locate suitable operating frequencies for new systems to integrate successfully with the existing RF environment. This includes selecting a *best* channel, preparing applications, filing and following to successful grant.

**Refarming Impact**

Implementing *Refarming* will create a flood of orders to help design and license new systems using a new technology. Manufacturers, representatives, dealers, and licensing specialists will reap a bounty of new business, all at client expense. No complaint!

I believe many aspects of *Refarming* can be beneficial as proven by 18 years of carefully nurtured and managed growth at 800 MHz. Fewer radio service categories, defined channel loading, power/elevation formulas, and a 12.5 KHz spaced narrow FM standard are notable examples of successful spectrum management techniques.

VHF/UHF improvement along similar guidelines is long overdue in an RF environment where excessive service categories, unrestrained loading, various channel spacings, and paging services that run rampant with raw power limit effective spectrum usage. The time for beneficial change, thoughtfully considered, is here.

PRO Refarming      The undersigned stands

FOR reduced service categories such as the traditional Public Safety, Industrial, Land Transportation to open more frequencies for new systems in each category, coordinated by competent spectrum management firms.

FOR power/elevation guidelines similar to those applied at 800 MHz to reduce excessive spectrum pollution and provide co-channel protection.

FOR 12.5 KHz FM channel spacing with ~~1~~5 KHz modulation standard for consistency through the spectrum. This will further benefit FCC and IRAC users with common synthesized equipment and increase the number of FM channels available.

FOR retaining mobile relay system configuration with designated pairs for licensees continuing to have extended car to car requirements.

FOR encouragement to SMRs that cater to small user units operated by financially strained owners who might otherwise operate unlicensed.

FOR encouragement to emerging technologies that  
~~provide access to UHF/UHF spectrum without disruption to~~

**CONTRA Refarming**

I believe many licensees who operate in existing radio services will be unable to afford wholesale changes as proposed, will find their communications systems technically compromised, will be unable to afford wholesale changes, and some will choose to abandon radio for financial reasons. Selling, reconditioning, and reassigning equipment will be impossible with a new 5 KHz spacing standard. In our 1993 economy and beyond, many radio users are attempting to get by with severely reduced means. Some aspects of *Refarming* could impede them severely rather than stimulate a future technology to benefit the majority of radio spectrum users.

The undersigned stands

AGAINST limitations that prematurely or unnecessarily obsolete existing systems and equipment for the favored sake of emerging technologies.

AGAINST abandoning narrowband FM technology because it has stood the test of time as the most effective voice radio technology.

AGAINST increasing paging service power levels because these operators have already conclusively proven their destructive interference potential by remorselessly radiating unsuppressed signals to the detriment of many nearby system licensees.

I applaud your vision for the future by proposing to resolve a number of issues within this complexly comprehensive Docket. Emerging technologies are ready for recognition and growth in this wondrous mobile radio environment in which we immerse ourselves. Today there exist a boundless quantity of *emerging applications* already, hidden in the recesses of 12.5 KHz UHF offsets where they are doing very well, thank you. When more manufacturers put their resources on the line and step up to produce these emerging technologies, then will we know they have a spectrum in which the systems can be licensed.

Respectfully submitted,

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